

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FLOYD, *et al.*,

08 Civ. 1034 (SAS)

Plaintiffs,

-against-

THE CITY OF NEW YORK, *et al.*,

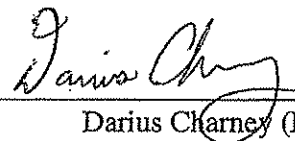
Defendants.

**REPLY DECLARATION OF
DARIUS CHARNEY IN SUPPORT
OF PLAINTIFFS' MOTION TO
COMPEL**

DARIUS CHARNEY hereby declares as follows:

1. I am a staff attorney with the Center for Constitutional Rights, attorneys for Plaintiffs in the above-captioned action.
2. I submit this declaration in further support of Plaintiffs' Motion to Compel production of the materials sought in Plaintiffs' First Request for the Production of Documents and in opposition to Defendants' Motion for a Protective Order.
3. Attached hereto as Exhibit 1 is a revised chart of the UF-250 data fields which (a) reflects Defendants' updated position on production of each of the data fields as set forth in their opposition to Plaintiffs' Motion to Compel, and (b) indicates whether the information in each field was produced to another entity.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on July 8, 2008.



Darius Charney (DC-1619)

EXHIBIT 1

**BY ORDER OF THE COURT, THIS EXHIBIT HAS BEEN FILED
UNDER SEAL**